

Country of Origin Labelling Program
Agricultural Marketing Service
United States Department of Agriculture
STOP 0249, 1400 Independence Ave. SW
Washington, DC
20250-0249

VIA Fax (202) 720-3499

VIA e-mail to cool@usda.gov

Dear Sir or Madam:

This letter is submitted in response to the extended deadline for comments "On a notice of a request for approval of information collection: "Interim Voluntary Country of Origin Labelling of Beef, Lamb, Pork, Fish, Perishable Commodities, and Peanuts Under the Agricultural Marketing Act of 1946."

Our company has very closely followed the Country of Origin Labelling (COOL) discussion as it has unfolded in the United States. We recognize the movement toward source verification and traceability initiatives for foodstuffs around the world. Our company has been in attendance at a number of industry meetings in the United States and have participated in presentations made by Secretary of Agriculture Ann Veneman, Barry Carpenter (Agricultural Marketing Service), etc. regarding the COOL program.

Much of the discussion in the public domain has centred upon the timeline and costs associated with execution of the COOL guidelines. A key component of this conversation has been that the United States has no uniform animal identification system and the 2002 Farm Bill specifically prohibits the United States Department of Agriculture (USDA) from establishing such an identification system. Additionally, producers are asking how information can be collected in a cost effective manner and how then this information can be kept intact across the entire supply chain such that COOL guidelines can be met for October 2004.

It is our very strong belief that COOL guidelines can be met as authored and defined by AMS, USDA. Having experienced and been a part of the evolution of mandatory animal identification in Canada, we have witnessed firsthand the challenges, requirements and opportunities that are encountered when initiatives such as COOL are introduced. During times of confusion, discontent, misinformation and rhetoric, we feel it is useful to examine the fundamental pieces that must be in place in order to execute true source verification and traceability across the supply chain. Clearly identifying and

understanding the fundamental elements allows the conversation to move to a more productive level where solutions can be defined and programs move rapidly to implementation.

As noted by Warren Mirtsching, Vice President Quality Assurance & Food Safety, Swift & Company:

“It’s important to note here that the issue is not whether the product is of domestic or foreign origin. Records must be kept to document the origin of both foreign and domestic livestock. The issue is whether the product is labeled and documented properly. To ensure that our record keeping is based in fact, we must be able to support it with a plan that ensures we can identify both our livestock and our products by national origin – as well as subsequent out-of-country stops.”

Proper product labeling and documentation requires three fundamental elements to come together in order to accomplish the end goal of true source verification and traceability from farm of origin to the consumer. The fundamental elements are:

1. Product identification (voluntary or mandatory). By definition, for source verification to occur, the product must be identified and retain this unique identity throughout its product lifecycle.
2. Data collection tools and interfaces for information gathering across the supply chain.
3. An integrated system that **cost effectively and efficiently can move information along the supply chain at the same speed as the product moves through the supply chain.**



Ability to be compliant with COOL voluntary guidelines exists today for the beef cattle supply chain at a fraction of the cost estimates being cited in the public domain. ViewTrak Technologies Inc. has successfully merged the elements of identification, data collection and an integrated Internet based

application which in all aspects address COOL requirements. ViewTrak has had many meetings and conversations with the processing industry regarding product identification through the processing plant environment and is keenly interested in working with this industry segment on this issue.

The global marketplace is demanding whole solutions that can accommodate source verification and traceability. Products that can add these features and add these attributes to their value propositions are likely to stand out in the marketplace. The value to be derived from this process in the consumer marketplace we believe to be largely undetermined. ***What we do know is that the ability to accommodate source verification and traceability exists today with the whole product solution that we have developed.***

Thank you for the opportunity to share our views on COOL and our perspective and tangible comments on how this program can come to execution. We very much look forward to discussing this with you and how we may assist your agency and the beef cattle supply chain in moving forward on this initiative.

Sincerely yours,

J.F. Burlet, DVM, MBA

President & CEO

www.viewtrak.com